

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et al.,

Plaintiffs,

v.

5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

OCA-GREATER HOUSTON, et al.,

Plaintiffs,

v.

1:21-cv-0780-XR

JANE NELSON, et al.,

Defendants.

**DISTRICT ATTORNEY OGG'S
OBJECTIONS TO OCA PLAINTIFFS' EXHIBIT LIST**

Exhibit No.		Description	Objections	
OCAPX-1		Report on Identification Number Requirements for Mail Balloting under SB 1, Prof. Eitan Hersh (Feb. 28, 2022)	FRE 702, 801 et seq.	
OCAPX-2		Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1, Prof. Eitan Hersh (May 4, 2022)	FRE 702, 801 et seq.	
OCAPX-3		Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1, Prof Eitan Hersh (Feb. 3, 2023)	FRE 702, 801 et seq.	
OCAPX-4		ADDENDUM TO: Second Supplement to Report on Identification Number Requirements for Mail Balloting under SB 1, Prof. Eitan Hersh (May 8, 2023)	FRE 702, 801 et seq.	
OCAPX-5		Voting Assistance & Vote by Mail, <i>La Unión Del Pueblo Entero et al. v. State of Texas et al.</i> , Tammy Patrick (Feb. 28, 2022)	FRE 702, 801 et seq.	
OCAPX-6		Texas Primary Supplement to Report, Voting Assistance & Vote by Mail, <i>La Union del Pueblo Entero et al. v. State of Texas et al.</i> , Tammy Patrick (Apr. 29, 2022)	FRE 702, 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-7		Texas 2022 General Election Supplement to Report, Voting Assistance & Vote by Mail, <i>La Union del Pueblo Entero et al. v. State of Texas et al.</i> , Tammy Patrick (Feb. 10, 2023)	FRE 702	
OCAPX-8		Declaration of Bernadette Maloney, May 24, 2023, ECF No. 611-1 Ex. 25	FRE 602, 701, 801 et seq.	
OCAPX-9		Declaration of Yi Lu Zhao, May 23, 2023, ECF No. 611-1 Ex. 26	FRE 602, 701, 801 et seq.	
OCAPX-10		Declaration of Ming Fei Yi, May 23, 2023, ECF No. 611-1 Ex. 27	FRE 602, 701, 801 et seq.	
OCAPX-11		Declaration of Riazuddin Ahmed, May 23, 2023, ECF No. 611-1 Ex. 28	FRE 602, 701, 801 et seq.	
OCAPX-12		Declaration of Joyce LeBombard, May 25, 2023, ECF No. 611-1 Ex. 30	FRE 602, 701, 801 et seq.	
OCAPX-13		Declaration of Grace Chimene, May 22, 2023, ECF No. 611-1 Ex. 31	FRE 602, 701, 801 et seq.	
OCAPX-14		Declaration of Cynthia Edmonsdson, May 22, 2023, ECF No. 611-1 Ex. 35	FRE 602, 701, 801 et seq.	
OCAPX-15		Declaration of Patricia Buck, May 18, 2023, ECF No. 611-1 Ex. 36	FRE 602, 701, 801 et seq.	
OCAPX-16		Declaration of Milan Suarez, May 18, 2023, ECF No. 611-1 Ex. 37	FRE 602, 701, 801 et seq.	
OCAPX-17		Declaration of Deborah Chen, May 22, 2023, ECF No. 611-1 Ex. 38	FRE 602, 701, 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-18		Declaration of Elizabeth Hwong, May 24, 2023, ECF No. 611-1 Ex. 40	FRE 602, 701, 801 et seq.	
OCAPX-19		Declaration of Sam Hwong, May 24, 2023, ECF No. 611-1 Ex. 41	FRE 602, 701, 801 et seq.	
OCAPX-20		Declaration of Bob Kafka, May 22, 2023, ECF No. 611-1 Ex. 42	FRE 602, 701, 801 et seq.	
OCAPX-21		Declaration of Teri Saltzman, May 22, 2023, ECF No. 611-1 Ex. 44	FRE 602, 701, 801 et seq.	
OCAPX-22		Declaration of Yvonne Iglesias, May 12, 2023, ECF No. 611-1 Ex. 45	FRE 602, 701, 801 et seq.	
OCAPX-23		Declaration of Laura Halvorson, May 24, 2023, ECF No. 611-1 Ex. 46	FRE 602, 701, 801 et seq.	
OCAPX-24		Declaration of Taylor Scott, May 22, 2023, ECF No. 611-1 Ex. 47	FRE 602, 701, 801 et seq.	
OCAPX-25		Declaration of Anne Scott, May 18, 2023, ECF No. 611-1 Ex. 48	FRE 602, 701, 801 et seq.	
OCAPX-26		Defendant Isabel Longoria's Objections and Answers to Plaintiffs' First Set of Interrogatories, May 13, 2022		
OCAPX-27		Defendant Rebecca Guerrero's Objections and Responses to Plaintiffs' Interrogatories, September 12, 2022		

Exhibit No.		Description	Objections	
OCAPX-35		064.127324 (CONFIDENTIAL) 2022 P22 App Rejections (Includes Voters that Cured Rej).xlsx		
OCAPX-36		Harris County Post-March 2022 Primary Press Release, “89% of Mail Ballots Flagged Under New Law Rejected”	FRE 801 et seq.	
OCAPX-37		064.127322 (CONFIDENTIAL) 2022 P22 - Ballot History Log.xlsx		
OCAPX-38		064.128587 P18 Ballot Board (CONFIDENTIAL).xlsx		
OCAPX-39		March 14, 2022, email from S. Taylor to P. Weber re: AP/Ballot Rejections	FRE 801 et seq.	
OCAPX-40		April 7, 2022, e-mail from K. Ingram to J. Williamson et al. re: county by county mail ballot numbers, attaching 2022 Primary BBM A-R.xlsx		
OCAPX-41		SOS Master Spreadsheet of 2022 Mail Ballot Acceptance/Rejection Rates by County for primary, primary run-off, and constitutional amendment elections		
OCAPX-42		SOS Master Spreadsheet of 2022 Mail Ballot Acceptance/Rejection Rates by County for primary, primary run-off, constitutional amendment, and general elections		

Exhibit No.		Description	Objections	
OCAPX-55		May 18, 2022, e-mail from SOS to Elections Internet re: MASS EMAIL (CC/EA-881): VoteReady Ballot by Mail Informational Pamphlets		
OCAPX-56		VoteReady Pamphlet	FRE 801 et seq.	
OCAPX-57		Harris County "Planning to Vote by Mail?" Voter Education Video		
OCAPX-58		Harris County Elections Recommendations for Ballot by Mail Applications, <i>Tips to avoid delays due to new State law</i>		
OCAPX-59		Harris County Post Election Report for November 2022 General Election		
OCAPX-60		Travis County BBM ID Reminder Insert - ABBM		
OCAPX-61		Travis County BBM ID Reminder Insert - Carrier Envelope		
OCAPX-62		Harris County Mail Ballot Inserts _CH		
OCAPX-63		Harris County Mail Ballot Inserts _SP		
OCAPX-64		Harris County Mail Ballot Inserts _VT		
OCAPX-65		November 22, 2021, email from C. Adkins to G. Maxey, re: Vote by mail app language, attaching ABBM-Final-11172021.pdf et al.		

Exhibit No.		Description	Objections	
OCAPX-89		October 9, 2022, email from Election Divisions Staff to voter re: RE: Vote Texas Contact Message		
OCAPX-90		October 27, 2022, email from H. Martinez to voter re: Vote seems to be suppressed (El Response)	FRE 801 et seq.	
OCAPX-91		August 24, 2022, email from Elections Division Staff to voter re: RE: Vote by Mail instructions (El Response)	FRE 801 et seq.	
OCAPX-92		February 28, 2022, email from D. Klinger to K. Hart re: RE: unable to verify my info	FRE 801 et seq.	
OCAPX-93		November 4, 2022, email from J. Montes to Elections Internet et al. re: RE: Online tracker on TXSOS website for ABBM has a flaw that is preventing look-up	FRE 801 et seq.	
OCAPX-94		January 12, 2022, email from C. Adkins to D. Gattuso et al. re: Web Edit - Advisories, attaching ADV2022-02 Instructions for Emailing Ballots Under the Federal MOVE Act (FINAL).docx et al.		
OCAPX-95		LWVTX “About Us” webpage printed on April 6, 2022	FRE 801 et seq.	
OCAPX-96		February 2, 2022, e-mail from P. Cheong to E. MacNamara et al., re: LWV-Texas Slate for 2022-24 and Strategic Plan, attaching LWV-Texas Slate 2022-24_2.02.22.docx et al.	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-97		LWVTX Advocacy & Issues, A Guide to League Program Issues, League of Women Voters of Texas, 2020-2022	FRE 801 et seq.	
OCAPX-98		January 31, 2022, email from G. Otto to D. Marchand re: Re: Comments to Spanish web version, attaching LWVTX-VG-2022-03-ENG-web-fn.pdf et al.	FRE 801 et seq.	
OCAPX-99		LWVTX November 2022 Voter's Guide	FRE 801 et seq.	
OCAPX-100		April 13, 2022, email from G. Chimene to L. Yeager, re: Re: who contact for Austin area candidate forum?	FRE 801 et seq.	
OCAPX-101		November 19, 2021, email from G. Chimene to J. Senecal et al., attaching 2021_A_Guide_to_Candidate_Forum_1_.pdf	FRE 801 et seq.	
OCAPX-102		January 22, 2022, email from J. Champlin to G. Chimene et al. re: question re: "assistance" in filling out ABBM	FRE 801 et seq.	
OCAPX-103		LWVTX Policies and Procedures, Revised 2022		
OCAPX-104		LWVTX Convention Manual, Revised 2012		
OCAPX-105		LWVTX 2021 Impact Report	FRE 801 et seq.	
OCAPX-106		LWVTX Bylaws		

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OCAPX-107		LWVTX Facebook post linking to ElPasoMatters.org article: New Texas voting law disenfranchised some of El Paso's longest-tenured voters	FRE 801 et seq.	
OCAPX-108		Results of LWVTX member vote by mail survey depicted in pie chart form	FRE 801 et seq.	
OCAPX-109		Results of LWVTX member vote by mail survey in spreadsheet form	FRE 801 et seq.	
OCAPX-110		LWVTX Statement on the Impact of SB 1 on Elections	FRE 801 et seq.	
OCAPX-111		March 17, 2022, email from G. Chimene to J. McKenzie re: Re: if you need stories of ballot issues, attaching LWV Texas Testimony Federal Subcommittee on Elections Committee on House Administration (1).pdf	FRE 801 et seq.	
OCAPX-112		LWVTX Facebook post with link to "Complete your ballot by mail Texas style" video	FRE 801 et seq.	
OCAPX-113		January 6, 2022, email from G. Chimene to SOS et al. re: Updates needed to votetexas.gov, texas.gov, county election websites	FRE 801 et seq.	
OCAPX-114		LWVTX Recommendations for the Texas SOS Elections Division	FRE 801 et seq.	
OCAPX-115		March 21, 2023, email from E. MacNamara to J. LeBombard re: LWVTX Capitol Action Report - 3/21/23	FRE 801 et seq.	

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OCAPX-116		February 15, 2022, email from K. Vix to G. Chimene et al. re: RE: CNN - Today	FRE 801 et seq.	
OCAPX-117		February 14, 2022, email from K. Lerner to G. Chimene re: Re: States Newsroom reporter request	FRE 801 et seq.	
OCAPX-118		February 14, 2022, email from S. Augustus to G. Chimene et al. re: RE: FW: PRESS REQUEST: Crooked Media	FRE 801 et seq.	
OCAPX-119		February 15, 2022, email from K. Vix to G. Chimene et al. re: RE: Election Prep	FRE 801 et seq.	
OCAPX-120		September 7, 2021, email from S. Beausoleil to G. Chimene re: NBC DFW: Interview in regards to SB1	FRE 801 et seq.	
OCAPX-121		February 23, 2022, email from C. Hogue to P. Clarembaux et al. re: Re: Request for interview with Univision	FRE 801 et seq.	
OCAPX-122		June 28, 2022, email from A. Mendelson to LWVTX President re: Interview Request	FRE 801 et seq.	
OCAPX-123		July 1, 2022, email from J. LeBombard to A. Mendelson re: Re: Interview Request	FRE 801 et seq.	
OCAPX-124		January 19, 2022, email from D. Marchand to G. Chimene re: Re: The scramble is on to address mail ballot application problems as a deadline looms Morning Report	FRE 801 et seq.	

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OCAPX-125		LWVTX Facebook post with link to LWVTX President interview about voting issues in the Texas Primaries	FRE 801 et seq.	
OCAPX-126		LWVTX Facebook post with link to NPR article quoting LWVTX President	FRE 801 et seq.	
OCAPX-127		Austin Monthly Magazine article: Texas' New Voting Laws Could Prove Hell this November	FRE 801 et seq.	
OCAPX-128		LWVTX PowerPoint presentation: Tips for Voters, new Election Laws 2022 (Feb. 3, 2022)	FRE 801 et seq.	
OCAPX-129		LWVTX PowerPoint presentation: Tips for Voters, new Election Laws 2022 (Aug. 23, 2022)	FRE 801 et seq.	
OCAPX-130		December 13, 2021, email from G. Chimene to G. Chimene re: Tips for Voters with Disabilities and Voters Over 65	FRE 801 et seq.	
OCAPX-131		January 12, 2022, email from G. Chimene to W. Bennett re: Re: HJAN retreat	FRE 801 et seq.	
OCAPX-132		February 2, 2022, e-mail from L. McKay to G. Chimene et al. re: Re: Call me if you get a chance. LWV, attaching 2022 Election Dates.docx et al.	FRE 801 et seq.	
OCAPX-133		January 28, 2022, email from G. Chimene to S. Gomez re: Re: VoteRiders Partners Toolkit Launch	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-134		January 19, 2022, email from G. Chimene to D. Marchand re: Re: VBM app question on the two IDs	FRE 801 et seq.	
OCAPX-135		November 7, 2021, email from M. Sridhar to G. Chimene re: Re: revised SB1 material	FRE 801 et seq.	
OCAPX-136		February 28, 2022, email from G. Chimene to D. Marchand re Re: Love Victoria advocate	FRE 801 et seq.	
OCAPX-137		August 11, 2022, email from LWV Texas State Office to J. Hillebrand et al. re: Re: Voting by mail questions	FRE 801 et seq.	
OCAPX-138		October 28, 2022, email from J. LeBombard to M. Cullinane re: Re: Fw: Travis County Elections Ballot by Mail - G22 Notice of Carrier Defect, attaching image005.jpg et al.	FRE 801 et seq.	
OCAPX-139		LWVTX "NEW Vote by Mail Resources!"	FRE 801 et seq.	
OCAPX-140		August 11, 2022, email from J. LeBombard to D. Tasian et al. re: Re: *Corrections* to New Vote by Mail Resources Links	FRE 801 et seq.	
OCAPX-141		November 9, 2022, email from D. Marchard re: Vote By Mail Education Materials - translated to Spanish	FRE 801 et seq.	
OCAPX-142		September 13, 2022, email from G. Chimene to J. LeBombard re: Re: Please review and edit: TEV Guest Blog for Vote by Mail Resources	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-143		September 14, 2022, email from L. Yeager to L. Yeager et al. re: TEV Update: Voting by mail in Texas, attaching vote by mail.png	FRE 801 et seq.	
OCAPX-144		January 14, 2022, email from D. Marchand to G. Chimene re: VBM Resources, attaching Vote by Mail and Register to vote One pager (3).pdf et al.	FRE 801 et seq.	
OCAPX-145		LWVTX PowerPoint presentation: Tips for Voters, New Election Laws 2022 (Dec. 10, 2021)	FRE 801 et seq.	
OCAPX-146		January 15, 2022, email from G. Chimene to V. DeBill et al. re: Re: Voter Education Information! - folks are using the wrong ABBM forms!	FRE 801 et seq.	
OCAPX-147		August 19, 2022, email from J. LeBombard to D. Marchand re: Website Updates for the New Vote by Mail Resources	FRE 801 et seq.	
OCAPX-148		June 17, 2022, email from G. Chimene to J. LeBombard re: Fwd: Voter Education	FRE 801 et seq.	
OCAPX-149		LWVTX President Op Ed in Houston Chronicle, January 2022, "Right to a mail ballot may hinge on number"	FRE 801 et seq.	
OCAPX-150		LWVTX YouTube video, Feb. 3, 2022: "Complete Your Ballot by Mail Texas Style with Step by Step Instructions!"	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-151		LWVTX YouTube video, Jan. 5, 2022: "Susan Shares Tips for Filling out the application to Vote by Mail"	FRE 801 et seq.	
OCAPX-152		LWVTX YouTube video, Jan. 2, 2022: "How to Vote by Mail Texas Style"	FRE 801 et seq.	
OCAPX-153		LWVTX 2022 Impact Report	FRE 801 et seq.	
OCAPX-154		August 16, 2022, email from J. LeBombard to R. Lederer et al. re: Re: LWV Scripts for Early Voting/Mail in Voting with Mickey Raphael, attaching Mickey Raphael-08.16.22.docx	FRE 801 et seq.	
OCAPX-155		June 17, 2022, email from G. Chimene to C. Thomas et al. re: Voter Education	FRE 801 et seq.	
OCAPX-156		May 16, 2022, email from J. Smith to A. McMurrer et al. re: Fwd: TEST - VOTE411 is Ready to Help Voters!	FRE 801 et seq.	
OCAPX-157		March 30, 2022, email from S. Schultz to G. Chimene re: Re: Feedback on voter education videos	FRE 801 et seq.	
OCAPX-158		LWVTX Tips for Voters - New Election Laws	FRE 801 et seq.	
OCAPX-159		LWVTX Vote by Mail Materials	FRE 801 et seq.	
OCAPX-160		January 18, 2022, email from A. Matthews to G. Chimene re: Re: vote by mail ballot info and question post webinar	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-161		April 6, 2022, email from A. Garza to D. Marchand et al. re: Re: Translations for 2022 Runoff Primary Voters Guide	FRE 801 et seq.	
OCAPX-162		LWVTX Filler for Runoff Election, May 24, 2022	FRE 801 et seq.	
OCAPX-163		Results of LWVTX March 2022 primary election voter survey in spreadsheet form	FRE 801 et seq.	
OCAPX-164		March 4, 2022 email from G. Chimene re: Tell Your Voting Story Survey	FRE 801 et seq.	
OCAPX-165		March 5, 2022, email from D. Marchand to L. Hathaway et al. re: Spread the word and get your community to share their Voting Stories!	FRE 801 et seq.	
OCAPX-166		LWVTX Facebook post sharing March 2022 primary election survey responses	FRE 801 et seq.	
OCAPX-167		Results of LWVTX November 2022 general election voter survey in spreadsheet form	FRE 801 et seq.	
OCAPX-168		LWVTX November 2022 general election voter survey	FRE 801 et seq.	
OCAPX-169		March 9, 2022, email from D. Weinberg to G. Chimene re: RE: Introduction	FRE 801 et seq.	
OCAPX-170		March 18, 2022, email from E. Wiant re: LWVTX Digital Communication Associate	FRE 801 et seq.	
OCAPX-171		February 7, 2022 email from REVUP-Texas to Barrier Free Futures re: FW: PBS Story on SB 1, attaching REVUP Info Program PowerPoint(2)(1)(1).pdf et al.	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-172		February 10, 2022, email from REVUP-Texas to B. Kafka re: HCOD Voting Rights Town Hall Access Barriers and Issues Related to TX SB 1 Law 2 8 22, attaching HCOD Voting Rights Town Hall Access Barriers and Issues Related to TX SB 1 Law 2 8 22.pptx	FRE 801 et seq.	
OCAPX-173		REVUP presentation: The After-effect of Senate Bill 1 (Mar. 10, 2022)	FRE 801 et seq.	
OCAPX-174		February 7, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Voting in Person or Mail in Ballots for People with Disabilities, attaching MAIL IN BALLOT INFO-FINAL 2022(2).pdf et al.	FRE 801 et seq.	
OCAPX-175		January 26, 2022, email from REVUP-Texas to J. Wesolek et al. re: Voting in Person or Mail in Ballots for People with Disabilities, attaching MAIL IN BALLOT INFO-FINAL 2022(2).pdf et al.	FRE 801 et seq.	
OCAPX-176		February 10, 2022, email from REVUP-Texas to listserv et al. re: Ballot By Mail - Early Voting Starting, attaching MAIL IN BALLOT INFO-FINAL 2022(2).pdf.	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-177		July 19, 2022, email from REVUP-Texas to S. Blahovec re: Tx Mail in Ballot, attaching <u>Vote_by_Mail_and_Register_to_vote_One_pager</u> <u>updated_3.28.22_gc_3_.pdf</u> et al.	FRE 801 et seq.	
OCAPX-178		January 17, 2022, email from REVUP-Texas to listserv et al. re: DISABILITY RIGHTS ARE CIVIL RIGHT* REV UP Texas Info Bulletin #2 * Mail in Ballot Texas, attaching MAIL IN BALLOT INFO-FINAL 2022.docx et al.	FRE 801 et seq.	
OCAPX-179		March 9, 2022, email from REVUP-Texas to J. Espinoza et al. re: RE: REV UP TEXAS! After Voter Supression.pptx	FRE 801 et seq.	
OCAPX-180		January 15, 2022, email from REVUP-Texas to L. Litowsky re: Ballot by mail Early Voting Draft, attaching Texas' New Voting Law JM edits.pptx	FRE 801 et seq.	
OCAPX-181		February 7, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: PBS story on SB 1, attaching REVUP Info Program PowerPoint(2)(1)(1).pdf et al.	FRE 801 et seq.	
OCAPX-182		March 25, 2022, email from REVUP-Texas to L. Litowsky et al. re: KPFT story on REV UP Texas	FRE 801 et seq.	
OCAPX-183		January 13, 2022, email from REVUP-Texas to L. Jackson re: RE: PBS Newshour & SB 1	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-184		January 29, 2022, email from REVUP-Texas to J. Huseman re: PBS story on SB 1, attaching REVUP Info Program PowerPoint(2)(1)(1).pdf et al.	FRE 801 et seq.	
OCAPX-185		February 9, 2022, email from REVUP-Texas to S. Dey, re: Re: The Texas Tribune inquiry, attaching REV UP - GENERAL INFO(2)(1).docx et al.	FRE 801 et seq.	
OCAPX-186		January 26, 2022, email from REVUP-Texas to A. Ura re: Re: BallotTracker - Ballot by Mail Application and Ballot Tracker, attaching Texas' New Voting Law JM edits(1).pptx et al.	FRE 801 et seq.	
OCAPX-187		BobKafka_LWVTX.mov on Vimeo: Bob Kafka asks the Texas Legislature: Do Not Suppress My Vote!	FRE 801 et seq.	
OCAPX-188		JosueRodriguez_LWVTX.mov on Vimeo: Jose Rodriguez asks the Texas Legislature: Do Not Suppress Our Vote!	FRE 801 et seq.	
OCAPX-189		StephanieThomas_LWVTX.mov on Vimeo: Stephanie Thomas asks the Texas Legislature: Do Not Suppress My Vote!	FRE 801 et seq.	
OCAPX-190		YouTube Video: "Disability Voters Mobilize for May Vote & Chilling Laws' w Bob Kafka, Rev-Up TX, KPFT News 3/25/22"	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-191		October 20, 2022, email from REVUP-Texas to list serv et al. re: Disability Community Turning Out The Disability Vote, attaching REV UP - 2022 AUSTIN EARLY VOTING OPPORTUNITY.docx et al.	FRE 801 et seq.	
OCAPX-192		September 30, 2022, email from REVUP-Texas to REVUP-Texas re: FW: TDIF: Power the Disability Vote!, attaching TDIF_PressRelease_FINAL.docx et al.	FRE 801 et seq.	
OCAPX-193		REVUP-Texas Facebook post linking to Texas Tribune article: "Texans with disabilities fear new restrictions on voting help could mean criminal charges at the polls" (Feb. 16, 2022)	FRE 801 et seq.	
OCAPX-194		REVUP-Texas Facebook post linking to YouTube video: "'Disability Voters Mobilize for May Amid & Chilling Rules' w Bob Kafka, Rev-Up TX, KPFT News 3/26/22" (Mar. 27, 2022)	FRE 801 et seq.	
OCAPX-195		Caller Times: Texans with disabilities fear voting bill will add more barriers to the ballot box	FRE 801 et seq.	
OCAPX-196		Texas Tribune: Texans with disabilities fear new restrictions on voting help could mean criminal charges at the polls	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-197		REVUP-Texas Facebook post: You're invited to Join Our Don't Dis the Vote Flash Mob (Dec. 21, 2021)	FRE 801 et seq.	
OCAPX-198		REVUP-Texas Facebook post (Jan. 17, 2022)	FRE 801 et seq.	
OCAPX-199		REVUP-Texas Facebook post (Jan. 17, 2022)	FRE 801 et seq.	
OCAPX-200		REVUP-Texas Facebook post (Mar. 7, 2022)	FRE 801 et seq.	
OCAPX-201		REVUP-Texas Facebook post linking to REVUP Podcast "Use Your Power" Episode 9 (Oct. 12, 2021)	FRE 801 et seq.	
OCAPX-202		REVUP-Texas Facebook post linking to REVUP Podcast "Use Your Power" Episode 18 (Sept. 7, 2021)	FRE 801 et seq.	
OCAPX-203		YouTube Video: REVUP Podcast "Use Your Power" Episode 8	FRE 801 et seq.	
OCAPX-204		REVUP-Texas Facebook post linking to REVUP Podcast (Sept. 19, 2022)	FRE 801 et seq.	
OCAPX-205		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching January 26, 2022, Invoice	FRE 801 et seq.	
OCAPX-206		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching December 28, 2021, Invoice	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-207		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching November 6, 2021, Invoice	FRE 801 et seq.	
OCAPX-208		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching June 25, 2021, Invoice	FRE 801 et seq.	
OCAPX-209		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching May 27, 2021, Invoice	FRE 801 et seq.	
OCAPX-210		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching April 26, 2021, Invoice	FRE 801 et seq.	
OCAPX-211		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching March 27, 2021, Invoice	FRE 801 et seq.	
OCAPX-212		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching December 6, 2021, Invoice	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-213		February 6, 2022, email from REVUP-Texas to Barrier Free Futures re: FW: Invoice due now - Communication by Hand, attaching January 26, 2022, Invoice	FRE 801 et seq.	
OCAPX-214		January 26, 2022, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching January 26, 2022, Invoice	FRE 801 et seq.	
OCAPX-215		November 6, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching November 6, 2021, Invoice	FRE 801 et seq.	
OCAPX-216		June 25, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching June 25, 2021, Invoice	FRE 801 et seq.	
OCAPX-217		December 28, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching December 28, 2021, Invoice	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-218		April 26, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching April 26, 2021, Invoice	FRE 801 et seq.	
OCAPX-219		March 27, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching March 27, 2021, Invoice	FRE 801 et seq.	
OCAPX-220		September 29, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching September 29, 2021, Invoice	FRE 801 et seq.	
OCAPX-221		December 6, 2021, email from Communication by Hand Billing to REVUP-Texas re: Invoice due now - Communication by Hand LLC, attaching December 6, 2021, Invoice	FRE 801 et seq.	
OCAPX-222		REVUP-Texas 2020 Resource Manual	FRE 801 et seq.	
OCAPX-223		Defendant Harris County District Attorney Kim Ogg's First Amended Responses to Plaintiff OCA-Greater Houston's Second Set of Interrogatories, March 21, 2023		

Exhibit No.		Description	Objections	
OCAPX-224		Defendant José Garza's Amended Objections and Responses to Plaintiff OCA-Greater Houston's First Set of Interrogatories, September 30, 2022		
OCAPX-225		Defendant Harris County District Attorney Kim Ogg's First Amended Responses to Plaintiff OCA-Greater Houston's Second Set of Interrogatories, March 21, 2023	Cumulative w/ OCAPX-223 FRE 403	
OCAPX-226		Defendant Harris County District Attorney Kim Ogg's Responses to LULAC Plaintiffs' Discovery Requests, March 17, 2023		
OCAPX-227		Supplemental Declaration of Joyce LeBombard, June 22, 2023, ECF No. 638-3 Ex. H-1	FRE 602, 701, 801 et seq.	
OCAPX-228		LWVTX Twitter post regarding criminal penalties for voter assistants	FRE 801 et seq.	Calls for legal conclusion
OCAPX-229		February 25, 2023, email from S. Swanson to A. Hendrickson et al. re: Re: An idea for legislation from our Elections Administrator	FRE 801 et seq.	
OCAPX-230		February 10, 2022, email from G. Chimene to A. Coronado re: Some more information on voter assistance, attaching Voter Assistance Talking points.docx	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-231		LWVTX Webpage explaining assistant requirements under SB 1 (Apr. 6, 2022)	FRE 602, 801 et seq.	Calls for legal conclusion
OCAPX-232		April 30, 2022, email from D. Marchand to G. Chimene re: Fwd: MDW Grant meeting, attaching Making_Democracy_Work_Agreement June 2021.pdf et al.	FRE 801 et seq.	
OCAPX-233		Supplemental Declaration of Deborah Chen, June 22, 2023, ECF No. 638-4 Ex. H-2	FRE 602, 701, 801 et seq.	
OCAPX-234		Supplemental Declaration of Bob Kafka, June 16, 2023, ECF No. 638-4 Ex. H-2	FRE 602, 701, 801 et seq.	
OCAPX-235		Houston Chronicle: Nearly 25,000 mail ballots were rejected in Texas primaries, fueled by confusion over new restrictions (Apr. 6, 2022), https://www.houstonchronicle.com/politics/article/25000-mail-ballots-rejected-Texas-17062282.php , printed on June 20, 2023	FRE 801 et seq.	
OCAPX-236		Expert Report of Professor Douglas L. Kruse, Ph.D., February 28, 2022	FRE 702	
OCAPX-237		Expert Report of Dr. Kara Ayers, February 28, 2022	FRE 702	
OCAPX-238		Testimony to the Senate Affairs Committee Against SB1, August 9, 2021, testimony by Courtney Pugh, member of The Arc of Texas	FRE 602, 701, 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-239		<i>SB 1 Makes It Difficult for Texans with Disabilities to Vote, Hearing Before the Senate State Affairs Committee, 2nd Special Session (2021)</i> (written statement of Alex Cogan, Manager of Pub. Policy & Advocacy, The Arc of Tex.)	FRE 801 et seq.	
OCAPX-240		Testimony of Patty Ducayet	FRE 602, 701, 801 et seq.	
OCAPX-241		Testimony of Anne Robinson	FRE 602, 701, 801 et seq.	
OCAPX-242		Rep. Bucy comments from April 1, 2023, House Elections Committee Hearing		
OCAPX-243		Supplemental Declaration of Anne Scott, dated June 18, 2023	FRE 602, 701, 801 et seq.	
OCAPX-244		Supplemental Declaration of Taylor Scott, dated June 18, 2023	FRE 602, 701, 801 et seq.	
OCAPX-245		Help America Vote Act (HAVA) information page from Texas SOS, https://web.archive.org/web/20220124191312/https://www.sos.texas.gov/elections/hava/hava_act.shtml , printed on June 21, 2023		
OCAPX-246		Help America Vote Act (HAVA) Update, Texas Association of Counties, Legislative Conference, dated August 27, 2020, ECF No. 642-2 Ex. 25	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-247		May 14, 2020, Letter from Ruth R. Hughs, Texas Secretary of State, to Mona Harrington, Acting Exec. Dir., U.S. Election Assistance Commission, https://www.eac.gov/sites/default/files/paymentgrants/cares/TX_CARES_Disbursement_RequestLetter.pdf , ECF No. 642-2, Ex. 26		
OCAPX-248		Expert Report of Daniel A. Smith, Ph.D., dated April 29, 2022	FRE 702	
OCAPX-249		Dallas County Elections Department webpage, https://www.dallascountvotes.org/ , printed on June 23, 2023		
OCAPX-250		Harris County Elections Administrator's Office webpage, https://www.harrisvotes.com/ , printed on June 23, 2023		
OCAPX-251		Bexar County Elections Department webpage, ECF No. 642-2 Ex. 50		
OCAPX-252		Travis County Voters with Disabilities webpage, https://countyclerk.traviscountytexas.gov/departments/elections/voters-with-disabilities/ , printed on June 23, 2023		

Exhibit No.		Description	Objections	
OCAPX-253		El Paso County Voters with Special Needs webpage, https://epcountyvotes.com/voter_information/voters_with_special_needs , printed on June 23, 2023		
OCAPX-254		Hidalgo County Voters with Special Needs webpage, ECF No. 642-2 Ex. 49		
OCAPX-255		Expert Report of Daniel A. Smith, Ph.D., dated April 22, 2023	FRE 702	
OCAPX-256		Harris County Commissioners Court Video webpage, https://harriscountytx.new.swagit.com/videos/158127 , printed on June 23, 2023		
OCAPX-257		Harris County Sheriff's Office Victim Advocates Award 2019-V3-GX-0134, https://ovc.ojp.gov/funding/awards/2019-v3-gx-0134 , printed on June 23, 2023		
OCAPX-258		Grant Summary to Harris County webpage, https://www.usaspending.gov/award/ASST_NON_2019V3GX0134_1550 , printed on June 23, 2023		

Exhibit No.		Description	Objections	
OCAPX-259		Texas Tribune: More than 12% of mail-in ballots were rejected in Texas under new GOP voting rules, final tally shows, https://www.texastribune.org/2022/04/06/texas-mail-in-ballot-rejection-voting/ (Apr. 6, 2022), printed on June 19, 2023	FRE 801 et seq.	
OCAPX-260		Expert Report of Dr. Allan J. Lichtman dated February 28, 2022	FRE 702	
OCAPX-261		Expert Report of Henry Flores, Ph.D. dated February 28, 2022	FRE 702	
OCAPX-262		Federal Postcard Application, available at https://www.fvap.gov/uploads/FVAP/Forms/fpca.pdf , printed on July 26, 2023		
OCAPX-263		Travis County BBM ID Reminder - ABBM FINAL		
OCAPX-264		Travis County BBM ID Reminder Insert - ABBM with Numbers		
OCAPX-265		Travis County BBM ID Reminder Insert - Carrier Envelope with Numbers		
OCAPX-266		Travis County BBM ID Reminder Insert - Carrier Envelope		
OCAPX-267		Harris County FAQ_MailBallots_EN		
OCAPX-268		Harris County Mail Ballot Inserts_EN		
OCAPX-269		Harris County Mail Ballot Tips		

Exhibit No.		Description	Objections	
OCAPX-321		Exhibit 2 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: LWVTX Amended Objections and Responses to State Defendants' First Set of Interrogatories (Apr. 25, 2022)	FRE 801 et seq., FRCP 33	
OCAPX-322		Exhibit 3 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: LWVTX 2020 Impact Report	FRE 801 et seq.	
OCAPX-323		Exhibit 4 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: LWVTX 2021 Impact Report	FRE 801 et seq.	
OCAPX-324		Exhibit 5 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: OCA-GH Plaintiffs' Second Amended Complaint, ECF No. 200	FRE 801 et seq.	
OCAPX-325		Exhibit 6 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: LWVTX Tips for Voters, New Election Laws 2022 (Dec. 10, 2021)	FRE 801 et seq.	
OCAPX-326		Exhibit 7 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: LWVTX 2021 Action Paper - Voting Rights & Election Laws	FRE 801 et seq.	
OCAPX-327		Exhibit 8 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: The 2021 Attack on Texas Voters; It could be worse	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-328		Exhibit 9 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: Results of LWVTX member vote by mail survey depicted in pie chart form	FRE 801 et seq.	
OCAPX-329		Exhibit 10 to LWVTX30(b)(6) Deposition of Grace Chimene, April 26, 2022: Results of LWVTX member vote by mail survey in spreadsheet form	FRE 801 et seq.	
OCAPX-330		Exhibit 3 to Deposition of Christina Adkins, April 11, 2023: ABBM (Spanish)		
OCAPX-331		Exhibit 4 to Deposition of Christina Adkins, April 11, 2023: October 27, 2022, email from H. Martinez to voter re: Vote seems to be suppressed (El Response)	FRE 801 et seq.	
OCAPX-332		Exhibit 5 to Deposition of Christina Adkins, April 11, 2023: Carrier Envelope		
OCAPX-333		Exhibit 6 to Deposition of Christina Adkins, April 11, 2023: October 9, 2022, email from Elections Division to voter, re: RE: Vote Texas Contact Message		
OCAPX-334		Exhibit 7 to Deposition of Christina Adkins, April 11, 2023: Form 6-17, Information About Returning Your Carrier Envelope		

Exhibit No.		Description	Objections	
OCAPX-335		Exhibit 8 to Deposition of Christina Adkins, April 11, 2023: April 1, 2022, email from B. Grimes to C. Adkins re: RE: Revised Carrier Envelopes	FRE 801 et seq.	
OCAPX-336		Exhibit 12 to Deposition of Christina Adkins, April 11, 2023: November 14, 2022, email from Elections Division Staff to voter re: RE: Vote Texas Contact Message (El Response)		
OCAPX-337		Exhibit 1 to Deposition of Frank Phillips, March 31, 2023: WFAA Article, Carrollton mayoral candidate arrested after police find forged mail-in ballots	FRE 801 et seq.	
OCAPX-338		Exhibit 1 to Deposition of Kara Ayers, May 10, 2022: Kara Ayers Expert Report dated Feb. 28, 2022	FRE 702, 801 et seq.	
OCAPX-339		Exhibit 2 to Deposition of Kara Ayers, May 10, 2022: SB 1 Enrolled		
OCAPX-340		January 25, 2023, email from L. Eder to J. Nanyes et al. re: RE: Voter with wrong TDCL - CASS County		
OCAPX-341		February 7, 2023, email from K. Ingram to C. Adkins re: FW: Request for SOS written interpretation, attaching reviewing-abbm-and-fpca-september-2022 (1).pdf		

Exhibit No.		Description	Objections	
OCAPX-376		February 28, 2022 email from K. Fisher to GeneralCounsel@sos.texas.gov et al. re: RE: Spreadsheet of Election Complaints referred to the OAG related to the November 2020 GE, attaching 2020_Nov. 2020 OAG Complaint Log.xlsx et al.		
OCAPX-377		OAG Election Fraud Violations spreadsheet showing prosecutions resolved and pending (Sept. 6, 2022)		
OCAPX-378		OAG Election Fraud Violations spreadsheet showing prosecutions resolved and pending (July 15, 2022)		
OCAPX-379		OAG Election Fraud Complaints Received from SOS (May 10, 2022)		
OCAPX-380		OAG PowerPoint presentation: Election Integrity		
OCAPX-381		Michael Hardy, Texas Election Chief Speaks Out on Conspiracy “Nuts,” Death Threats, and President Biden’s Legitimacy, TEXAS MONTHLY, (Oct. 10, 2022), https://www.texasmonthly.com/news-politics/john-scott-texas-secretary-state-election-fraud/ , printed on July 26, 2023	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-410		Grant Summary to Harris County webpage, https://www.usaspending.gov/award/A_SST_NON_2019V3GX0134_1550 , printed on July 28, 2023		
OCAPX-411		Screenshot of Ballot by Mail Tracker Page, https://teamrv-mvp.sos.texas.gov/BallotTrackerApp/#/ login, printed on July 28, 2023		
OCAPX-412		Texas Tribune: More than 12% of mail-in ballots were rejected in Texas under new GOP voting rules, final tally shows, https://www.texastribune.org/2022/04/06/texas-mail-in-ballot-rejection-voting/ (Apr. 6, 2022), printed on July 28, 2023	FRE 801 et seq.	
OCAPX-413		Houston Chronicle: Nearly 25,000 mail ballots were rejected in Texas primaries, fueled by confusion over new restrictions (Apr. 6, 2022), https://www.houstonchronicle.com/politics/article/25000-mail-ballots-rejected-Texas-17062282.php , printed on July 28, 2023	FRE 801 et seq.	

Exhibit No.		Description	Objections	
OCAPX-434		Exhibit 10 to OCA-GH 30(b)(6) Deposition on March 28, 2022: Exit Poll Survey Statement	FRE 801 et seq.	
OCAPX-435		Exhibit 11 to OCA-GH 30(b)(6) Deposition on March 28, 2022: November 3rd, 2020, General and Special Elections Early Voting Schedule for Harris County		
OCAPX-436		Exhibit 12 to OCA-GH 30(b)(6) Deposition on March 28, 2022: Houston Chronicle article, Harris County unveils multilingual virtual translators for polling sites	FRE 801 et seq.	
OCAPX-437		Exhibit 1 to Deposition of Amatullah Contractor, July 20, 2022: Private Plaintiffs' Supplemental Rule 26(a)(1) Initial Disclosures	FRE 801 et seq.	
OCAPX-438		Exhibit 2 to Deposition of Amatullah Contractor, July 20, 2022: Supplement to Plaintiff United States' Amended Initial Disclosures	FRE 801 et seq.	
OCAPX-439		Exhibit 3 to Deposition of Amatullah Contractor, July 20, 2022: SB 1 Enrolled		
OCAPX-440		Exhibit 4 to Deposition of Amatullah Contractor, July 20, 2022: Handbook for Election Judges and Clerks, Qualifying Voters on Election Day, 2022 (revised July 2022)		

Exhibit No.		Description	Objections	
OCAPX-468		Exhibit 18 to Harris County Elections Administrator 30(b)(6) Deposition of Rachelle Obakozuwa, March 21, 2023: Harris County Elections Administrator PowerPoint presentation: Black Ballot Rejection Rates (Mar. 29, 2022)	FRE 801 et seq.	
OCAPX-469		Exhibit 19 to Harris County Elections Administrator 30(b)(6) Deposition of Rachelle Obakozuwa, March 21, 2023: Form 7-58, Oath of Assistance/Roster of Assistants		
OCAPX-470		Exhibit 4 to REVUP-Texas 30(b)(6) Deposition on April 7, 2022: Witness list, State Affairs Committee (Aug. 9, 2021)		
OCAPX-471		Declaration of Chris Rainbolt, Texas Civil Rights Project paralegal, authenticating various screenshots of webpages printed on July 26, 2023, and July 28, 2023.	FRE 801 et seq.	
		Any exhibit marked by any party		
		Defendants' Responses to Interrogatories and Requests for Admissions		